

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

J.G.,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION FILE
vs.	:	
	:	NO. 1:20-cv-05233-SEG
NORTHBROOK INDUSTRIES,	:	
INC., D/B/A UNITED INN AND	:	
SUITES,	:	
	:	CONSENT MOTION
Defendant.	:	

**PLAINTIFF’S CONSENT MOTION TO EXTEND THE DEADLINE TO
REPLY TO DEFENDANT’S RESPONSE IN OPPOSITION TO
PLAINTIFF’S SUPPLEMENTAL MOTION PURSUANT TO LR54.2,
NDGa FOR ATTORNEY’S FEES AND EXPENSES**

Plaintiff hereby moves, with **consent** of Defendant, to extend the deadline for Plaintiff to file a Reply to Defendant’s Response in Opposition to Plaintiff’s Supplemental Motion Pursuant to LR54.2, NDGa for Attorney’s Fees and Expenses (Doc. 268). In support, Plaintiff states the following:

1.

On October 13, 2025, Defendant filed a Response in Opposition to Plaintiff’s Supplemental Motion Pursuant to LR54.2, NDGa for Attorney’s Fees and Expenses. (Doc.268).

2.

The deadline for Plaintiff to file a reply to the same motion is October 27, 2025.

3.

Plaintiff requests a fourteen-day extension to November 10, 2025, to file a Reply to Defendant's Response. Plaintiff requests the extension due to the press of other matters.

4.

Defendant has consented to an extension of the deadline for Plaintiff to file a Reply to Defendant's Response to November 10, 2025.

5.

This is the first extension Plaintiff has requested to file a Reply to Defendant's Response in Opposition to Plaintiff's Supplemental Motion Pursuant to LR54.2, NDGa for Attorney's Fees and Expenses, and, therefore, Plaintiff respectfully requests that the Court grant the instant consent motion. The text of a proposed Consent Order is attached hereto as "Exhibit A."

WHEREFORE, Plaintiff respectfully requests that this Court grant the instant Consent Motion for the reasons set forth above.

Respectfully submitted this 20th day of October, 2025.

/s/ David H. Bouchard

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Attorneys for Plaintiff

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing pleading has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

Respectfully submitted,

/s/ David H. Bouchard

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing filing into the District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Respectfully submitted this 20th day of October, 2025.

/s/ David H. Bouchard

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